

1 The Honorable Robert S. Lasnik
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 DANIELLE LLERA,
10 Plaintiff,

11 v.
12 TECH MAHINDRA (AMERICAS) INC., a
Delaware Corporation,

13 Defendant.

NO. 2:19-cv-00445-RSL

**STIPULATED MOTION FOR
ORDER EXTENDING TIME FOR
AMENDED ANSWER**

14 **STIPULATION**

15 The Parties, by and through their respective counsel of record, move the Court for an
16 Order extending time for Defendant Tech Mahindra Americas Inc., (“Tech Mahindra”) to file
17 a response to the Second Amended Complaint.

18 **FACTS AND ARGUMENT**

19 This case was originally filed in King County Superior Court on March 6, 2019. On
20 March 26, 2016, the matter was removed from King County Superior Court and filed in the
21 United States District Court for the Western District of Washington.

22 There is currently no trial date set in this matter, as all deadlines were stricken by the
23 Court’s “Order Continuing Case Management Deadlines.” *See* Dkt. 98. Pursuant to the

STIPULATED MOTION FOR ORDER EXTENDING DEFENDANT'S
TIME TO FILE AN AMENDED ANSWER - 1
Case No. 2:19-cv-00445-RSL

1 Court's August 30 "Order Granting Leave to Amend Complaint" a new case management
2 order providing at least 60 more days of discovery will be issued following the resolution of
3 Dkt. 90. *See* Dkt. 108.

4 On August 5, 2021, the Plaintiff filed a Motion for Leave to Amend the Complaint,
5 which was unopposed by Tech Mahindra. *See* Dkt. 106.

6 On August 30, 2021, the Court issued an Order granting Plaintiff's Motion. *See* Dkt.
7 108. And the same day, Plaintiff filed the Second Amended Complaint. *See* Dkt. 109.

8 Pursuant to Fed. R. Civ. P. 15, Defendant's response to the Second Amended
9 Complaint is due on Monday September 13, 2021.

10 Following discussions between Kelley Drye & Warren LLP and Tech Mahindra, Tech
11 Mahindra advised defense counsel on Tuesday, September 8, 2021 that it would proceed with
12 new counsel for the remainder of this litigation. Additional time is, therefore, required by
13 Tech Mahindra to transfer all activity in this case to new counsel and to allow new counsel to
14 prepare and file the Amended Answer.

15 To that end, counsel for Plaintiff has agreed to a 30-day extension of time for Tech
16 Mahindra to respond to the Second Amended Complaint.

17 Good cause exists for this extension, and thus the Parties respectfully request:

- 18 1. Tech Mahindra's time to file an Amended Answer is extended by 30 days, or
19 until Wednesday October 13, 2021.

20 **AGREED AND STIPULATED TO** this 8th day of September, 2021.

21 By: /s/ Matthew J. Bean

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22 By /s/ Mark A. Konkel

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23 STIPULATED MOTION FOR ORDER EXTENDING DEFENDANT'S
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Case No. 2:19-cv-00445-RSL

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7 *Attorneys for Defendant*
Tech Mahindra (Americas) Inc.

9 **ORDER**

10 IT IS SO ORDERED.

11 DATED this 9th day of September, 2021.

12 
13 M. S. Casnik
14 UNITED STATES DISTRICT JUDGE

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STIPULATED MOTION FOR ORDER EXTENDING DEFENDANT'S
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1 Presented by:

2 BEAN LAW GROUP

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5 KELLEY DRYE & WARREN LLP

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STIPULATED MOTION FOR ORDER EXTENDING DEFENDANT'S
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